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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**MOTION TO DISMISS AND OPPOSITION
TO DETROIT DIESEL CORPORATION'S MOTION FOR AN ORDER EXTENDING
AND ENFORCING THE STAY IMPOSED UNDER 11 U.S.C. §362(a) TO COVER
CERTAIN LITIGATION RELATING TO DETROIT DIESEL CORPORATION, OR
ALTERNATIVELY, ENJOINING SUCH LITIGATION PURSUANT TO 11 U.S.C. §105**

Now into Court, through undersigned counsel, come objectors and movers, Jeanette Garnett Pichon (surviving spouse of Leon Roland Pichon) and, Roland L. Pichon, Mark P. Pichon, Patrice Pichon Robinson, Tracy Pichon Baham, Veronica Pichon Joseph, and Cade Pichon Hagger (plaintiffs in the state action), who move to dismiss the Motion for an Order Extending and Enforcing the Stay or Alternatively Enjoining Litigation filed by Detroit Diesel Corporation ("DDC") on the following grounds that the motion fails to state a claim upon which relief can be granted, lack of subject-matter jurisdiction or alternatively for abstention, lack of personal jurisdiction, and on the basis that DDC is not entitled to a stay of plaintiffs' state court action, all of which are more fully set forth in the memorandum attached hereto.

WHEREFORE, objectors and movers respectfully request that the motion of Detroit Diesel Corporation be dismissed or, alternatively, denied.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this opposition/pleading has been served upon counsel for all parties by Electronic Service through the Electronic Case Filing System or by FAX or by mailing same to each, on this 30th day of September, 2009.

/s/ Gerolyn P. Roussel

Gerolyn P. Roussel

ROUSSEL & CLEMENT

/s/Gerolyn P. Roussel

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Joseph, and Cade Pichon Hagger*